

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

JANE DOES 1-9,

Civil Action Number: 7:20-cv-00947-TMC

Plaintiffs,

v.

COLLINS MURPHY, LIMESTONE  
COLLEGE, MG FREESITES LTD d/b/a  
PORNHUB.COM, and HAMMY MEDIA,  
LTD. d/b/a XHAMSTER.COM,

Defendants.

**DEFENDANT MG FREESITES'  
ANSWERS TO LOCAL  
RULE 26.01 INTERROGATORIES**

Defendant MG FREESITES LTD d/b/a PORNHUB.COM ("Defendant MG Freesites")  
answers interrogatories propounded by Rule 26.01, Local Civil Rules (D.S.C.), as follows:

- (A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

**ANSWER: None.**

- (B) As to each claim, state whether it should be tried jury or nonjury and why.

**ANSWER: Plaintiffs' claims raised in the Second Amended Complaint (Dkt. # 33)  
should be tried by jury as seeking legal remedies for damages allegedly incurred.**

- (C) State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

**ANSWER:** Defendant MG Freesites is a privately-owned, foreign company. The remaining inquiry contained within LR26.01 ROG#3 is therefore inapplicable and not answered.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civ. Rule 3.01 (D.S.C.).

**ANSWER:** Defendant MG Freesites does not oppose venue as the Second Amended Complaint alleges facts and circumstances purportedly arising within the Spartanburg Division of the District of South Carolina.

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**ANSWER:** Defendant MG Freesites is unaware of any related cases, pending or otherwise, in the District of South Carolina.

(F) *[Defendants only.]* If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**ANSWER: Defendant MG Freesites is properly identified.**

(G) [*Defendants only.*] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

**ANSWER: Defendant MG Freesites does not, at this time, allege that some other person or legal entity is, in whole or in part, liable to Plaintiffs or Defendant MG Freesites.**

**Defendant MG Freesites reserves the right to amend this answer following discovery.**

Respectfully submitted,

DATED August 1, 2020

TURNER, PADGET, GRAHAM AND LANEY, P.A.

Greenville, South Carolina

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